

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO**

IN RE:

MEUNGHEE JOUNG,

Debtor.

No. 10-15997-j7

**OBJECTION OF BANK'34 TO DEBTOR
MEUNGHEE JOUNG'S MOTION TO CONVERT CASE TO
ONE UNDER CHAPTER 11**

COMES NOW, the Creditor, BANK'34, by and through its counsel of record, Martin, Lutz, Roggow & Eubanks, P.C., by James A. Roggow, and objects to the Debtor's Motion to Convert Case to One Under Chapter 11, and as cause therefore, would show to the Court that the Debtor's action in this bankruptcy, and prior to this bankruptcy, have not been in good faith. Her Schedules and Statements only recently filed (and tardily filed at that), do not show, based upon her reported income versus her debts, any ability to reorganize anyways, but that as a result of the bad faith of the Debtor, the Debtor should be denied the ability to convert the case to one under Chapter 11.

WHEREFORE, Creditor Bank'34 prays the Court deny the Debtor, Meunghee Joung's Motion to Convert the Case to One Under Chapter 11, and for such other and further relief as to the Court may seem just and equitable.

RESPECTFULLY SUBMITTED BY:

MARTIN, LUTZ, ROGGOW,
& EUBANKS, P.C.

By: /s/ Submitted Electronically
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CERTIFICATE OF MAILING

The undersigned hereby certifies that he mailed via First Class Mail, Postage Pre-paid, a true and correct copy of the foregoing instrument to the following parties of record on this 11th day of January, 2011:

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